

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-against- : 16 Cr. 398 (PAE)

SAJMIR ALIMEHMETI, :

Defendant. :

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NOTICE OF MOTION

Please take notice that upon the accompanying memoranda of law, Sajmir Alimehmeti, by and through his counsel, will move this Court, before the Honorable Paul A. Engelmayer, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, at a time and date to be set by the Court, for an Order: (i) suppressing all evidence obtained or derived pursuant to the Foreign Intelligence Surveillance Act (“FISA”), or in the alternative, directing that a *Franks* hearing be held and that the Government’s FISA applications, the resulting orders, and related materials be disclosed to the defense; (ii) requiring the Government to give notice of whether or not Executive Order 12333 surveillance was used in this case and provide discovery relating to such surveillance; and (iii) awarding such other further relief as is just and proper.

Dated: New York, New York  
May 15, 2017

Respectfully Submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Sabrina P. Shroff  
Sylvie Levine  
Noelle E. Lyle  
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